

THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re: Michelle L. Campbell,  
Debtor

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CASE NO. 20-14031-ELF

Michelle L. Campbell,  
Movant  
v.

CHAPTER 13

Nationstar Mortgage LLC d/b/a Mr. Cooper  
Respondent

and

William C. Miller, Esquire  
Chapter 13 Trustee

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**STIPULATION OF SETTLEMENT OF DEBTOR'S OBJECTION TO CLAIM NO. 2 BY  
NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER**

In settlement of Debtor's objection to claim no. 2 filed by Nationstar Mortgage LLC d/b/a Mr. Cooper ("Nationstar"), the undersigned parties (the "Parties") hereby stipulate to the following:

1. Debtor filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code on October 8, 2020.
2. On December 9, 2020, a proof of claim was filed by Nationstar. The claim reflects the mortgage loan secured by Debtor's real estate at 203 E. Race Street, Pottstown, PA 19464.
3. The stated claim amount is \$121,488.78 and reflects \$34,554.10 in pre-petition mortgage loan arrears.
4. Debtor objected to claim no. 2 on May 4, 2021.

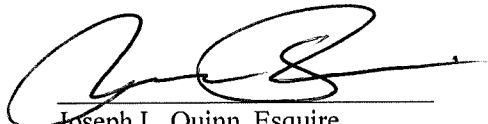
5. The Parties agree that the total claim value of Claim No. 2 shall be reduced to \$115,619.08.
6. The Parties agree that the pre-petition loan arrears of Claim No. 2 shall be reduced to \$28,684.40.
7. This Stipulation shall act as an amendment to Nationstar's Proof of Claim, and no further filings or amendments needed.
8. The Parties agree that if Nationstar offers a loan modification to Debtor and Debtor accepts the modification during the pendency of this Chapter 13 bankruptcy case, then Nationstar agrees to incorporate the \$5,869.70 in fees/cost reduction reflected in this stipulation into the terms of the loan modification.
9. Each party shall bear their own attorney's costs and fees incurred in furtherance of this stipulation.
10. This Stipulation may be executed in one or more counterparts, telefaxed, and electronic signatures are acceptable and shall be treated as originals.

/s/Rebecca A. Solarz, Esq.

6/23/2021

Rebecca A. Solarz, Esquire  
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Attorney for Nationstar Mortgage LLC  
d/b/a Mr. Cooper

Date



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jqinn@rqplaw.com  
Attorney for Debtor

6/22/2021  
Date

/s/ Leroy Etheridge, Esquire \*

June 30, 2021

Leroy Etheridge, Esquire  
for William C. Miller  
Chapter 13 Standing Trustee  
elf@ph13trustee.com  
Phone: (215) 627-1377

Date

\* no objection to its terms, without prejudice to any of our rights and remedies